

EXHIBIT 82

Page 1

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)
)
Individual and Representative) Lead Case No.
Plaintiffs,)
) 3:23-cv-03417-VC
v.)
)
Meta Platforms, Inc.,)
)
Defendant.)

** H I G H L Y C O N F I D E N T I A L **

30(b)(6) VIDEOTAPED DEPOSITION OF
META PLATFORMS, INC.

BY: MICHAEL PATRICK CLARK

Denver, Colorado

VOLUMES I AND II

Wednesday, November 13, 2024

Thursday, November 14, 2024

Reported stenographically by:
Michelle Kirkpatrick, RDR-CRR-CRC-CRI, FCRR

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Page 166

1 statement that "Our lawyers really need to look into
2 fair use claims for research."

3 BY MS. POUEYMIROU:

4 Q And what makes you read it that way?

5 A The next thing that Susan Zhang types --
6 it is their next contribution to this chat.

7 And up above, when they state: "Our
8 lawyers really need to look into these fair use
9 claims," usually in talking with counsel, it's to
10 identify risks and have conversations and identify
11 mitigations.

12 And so the way I read this, this is a
13 conversation where Susan is saying, We should have
14 conversations and pull in lawyers to help us to
15 identify if these can be used under fair use or not
16 and that we should identify what the risks of doing
17 so are.

18 Q Okay. We then have, directly after
19 Susan's statement, "Everyone is using LibGen.
20 Startups but also Google, Open AI."

21 And Presani says: "I mean, everyone is
22 doing a lot of things. It doesn't mean it's the

Page 167

1 right thing to do. That's pirated material."

2 A Where was that?

3 Q It's just following -- I'm just working
4 through the document with --

5 A Got it. Okay.

6 Q Okay. Presani doesn't make any
7 distinctions about the material within LibGen, some
8 of it being pirated and some of it not.

9 Correct?

10 MS. HARTNETT: Objection to the form.

11 A I don't -- can you reask that question?

12 BY MS. POUEYMIROU:

13 Q What I'm asking you is whether -- Presani
14 has characterized LibGen as a pirated website.

15 Isn't that correct?

16 MS. HARTNETT: Object to the form.

17 A In the prior line at 70443, they did
18 classify LibGen and Sci-Hub as illegal, pirated
19 websites in their opinion.

20 BY MS. POUEYMIROU:

21 Q And Xavier Martinet says: "I don't think
22 we are arguing about it, Eleonora. We want to buy

Page 200

1 STENOGRAPHIC REPORTER'S CERTIFICATE

2 I, Michelle Kirkpatrick, a Registered
3 Diplomat Reporter, Federal Certified Realtime
4 Reporter, do hereby certify that previous to the
5 commencement of the examination, the deponent was duly
6 sworn by me to testify to the truth.

7 I further certify that this deposition
8 was taken in shorthand by me at the time and place
9 herein set forth and was thereafter reduced to
10 typewritten form, and the foregoing constitutes a true
11 and correct transcript.

12 I further certify that I am not related
13 to, employed by, nor of counsel for any of the parties
14 or attorneys herein nor otherwise interested in the
15 outcome of this action.

16 IN WITNESS WHEREOF, I have hereunto set
17 my hand this 18th day of November, 2024.

18

19



20

MICHELLE KIRKPATRICK

RDR-CRR-CRC-CRI, FCRR

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